

A-G79 @B9CI G'H9LH'fl 97 : cfa ' - - L

PAGE 1 / 3

This response pertains to the Reports Analysis Division's ("RAD") Request for Additional Information ("RAI") dated November 27, 2012, covering Restore Our Future, Inc.'s ("ROF") 2012 Amended April Monthly Report (03/01/2012 - 03/31/2012), received by the Commission on April 24, 2012.

RAD seeks clarification on ROF's reporting of independent expenditures ("IE") during the 2012 Republican primaries in March. Specifically, the RAI alleges that Schedule E of ROF's Amended April Monthly Report indicates that ROF may have failed to file and timely file one or more 24 hour independent expenditure reports. The RAI lists as an attachment the IEs in question. Each IE is addressed in turn below.

Alleged "Missing" 24 Hour Reports

1. Actuate Strategies, LLC, 3/4/12, \$35,806.05, Voter Contact Phones, Richard J. Santorum

This appears to be referring to an IE made on 3/4/12 opposing Rick Santorum for the 3/6/12 Ohio Primary. ROF timely filed a 24 hour report on 3/5/12 reflecting this IE (Image #12950671018). ROF's Amended April Monthly Report listed this IE two (2) times in error on Schedule E. This duplicate entry has been deleted in a newly amended April Report.

2. Actuate Strategies, LLC, 3/4/12, \$12,546.90, Voter Contact Phones, Richard J. Santorum

This appears to be referring to an IE made on 3/4/12 opposing Rick Santorum for the 3/6/12 Oklahoma Primary. ROF timely filed a 24 hour report on 3/5/12 reflecting this IE (Image #12970527554). ROF's Amended April Monthly Report listed this IE two (2) times in error on Schedule E. This duplicate entry has been deleted in a newly amended April Report.

3. Actuate Strategies, LLC, 3/4/12, \$18,670.95, Voter Contact Phones, Richard J. Santorum

This appears to be referring to an IE made on 3/4/12 opposing Rick Santorum for the 3/6/12 Tennessee Primary. ROF timely filed a 24 hour report on 3/5/12 reflecting this IE (Image #12950671020). ROF's Amended April Monthly Report listed this IE three (3) times in error on Schedule E. This triplicate entry has been deleted in a newly amended April Report.

4. Actuate Strategies, LLC, 3/5/12, \$18,661.05, Voter Contact Phones, Mitt Romney

This appears to be referring to an IE made on 3/5/12 opposing Rick Santorum for the 3/6/12 Tennessee Primary. Pursuant to 11 CFR 104.4(c), ROF was not required to file a 24 hour report for this IE because it fell within 24 hours before the 3/6/12 Tennessee primary.

5. Mentzer Media Services, Inc., 3/16/12, \$193,325.10, Media Buy, Richard J. Santorum

This appears to be referring to an IE made on 3/16/12 opposing Rick Santorum for the 3/20/12 Illinois Primary. ROF timely filed a 24 hour report on 3/17/12 reflecting this IE (Image #12970747269). ROF's Amended April Monthly Report listed this IE two (2) times in error on Schedule E. This duplicate entry has been deleted in a newly amended April Report.

6. Actuate Strategies, LLC, 3/16/12, \$5,324.66, Voter Contact Phones, Richard J. Santorum

This appears to be referring to an IE made on 3/16/12 supporting Mitt Romney for the 3/24/12 Louisiana Primary. ROF amended its 3/17/12 24 hour report to reflect this IE on 3/18/12 (Image #12951237922). ROF's Amended April Monthly Report listed this IE three (3) times in error on Schedule E. This triplicate entry has been deleted in a newly amended April Report.

7. Actuate Strategies, LLC, 3/16/12, \$5,324.66, Voter Contact Phones, Richard J. Santorum

A-G7 9 @B9CI G'H9LH'fl 97 : cfa ' - - L

PAGE 2 / 3

See response #6 above.

8. Arena Communications, 3/16/12, \$52,715.00, Direct Mail, Richard J. Santorum

This appears to be referring to an IE made on 3/16/12 opposing Rick Santorum for the 3/24/12 Louisiana Primary. ROF timely filed a 24 hour report on 3/17/12 reflecting this IE (Image #12951237684). ROF's Amended April Monthly Report listed this IE three (3) times in error on Schedule E. This triplicate entry has been deleted in a newly amended April Report.

9. Arena Communications, 3/16/12, \$52,715.00, Direct Mail, Richard J. Santorum

See response #8 above.

10. Mentzer Media Services, Inc., 3/16/12, \$141,658.94, Media Buy, Mitt Romney

This appears to be referring to an IE made on 3/16/12 supporting Mitt Romney for the 3/24/12 Louisiana Primary. ROF timely filed a 24 hour report on 3/17/12 reflecting this IE (Image #12951237684). ROF's Amended April Monthly Report listed this IE two (2) times in error on Schedule E. This duplicate entry has been deleted in a newly amended April Report.

11. McCarthy Hennings Media, Inc., 3/16/12, \$2,464.40, Media Production, Richard J. Santorum

This appears to be referring to an IE made on 3/16/12 opposing Rick Santorum for the 3/20/12 Illinois Primary. ROF timely filed a 24 hour report on 3/17/12 reflecting this IE (Image #12970747269). ROF's Amended April Monthly Report listed this IE two (2) times in error on Schedule E. This duplicate entry has been deleted in a newly amended April Report.

Alleged "Late" 24 Hour Reports

12. Actuate Strategies, LLC, 3/5/12, \$12,454.74, Voter Contact Phones, Mitt Romney, Received 3/27/12

This appears to be referring to an IE made on 3/5/12 supporting Mitt Romney for the 3/6/12 Oklahoma Primary. Pursuant to 11 CFR 104.4(c), ROF was not required to file a 24 hour report for this IE because it fell within 24 hours before the 3/6/12 Oklahoma primary. Although it was not required to file a 24 hour report for this IE, ROF chose to amend its 3/5/12 report on 3/27/12 to reflect IEs made within 24 hours of the 3/6/12 Oklahoma Primary. Such over-reporting does not result in a "late" filing.

13. Actuate Strategies, LLC, 3/5/12, \$35,583.75, Voter Contact Phones, Mitt Romney, Received 3/27/12

This appears to be referring to an IE made on 3/5/12 supporting Mitt Romney for the 3/6/12 Ohio Primary. Pursuant to 11 CFR 104.4(c), ROF was not required to file a 24 hour report for this IE because it fell within 24 hours before the 3/6/12 Ohio primary. Although it was not required to file a 24 hour report for this IE, ROF chose to amend its 3/5/12 report on 3/27/12 to reflect IEs made within 24 hours of the 3/6/12 Ohio Primary. Such over-reporting does not result in a "late" filing.

14. Actuate Strategies, LLC, 3/5/12, \$18,661.05, Voter Contact Phones, Mitt Romney, Received 3/27/12

This appears to be referring to an IE made on 3/5/12 supporting Mitt Romney for the 3/6/12 Tennessee Primary. Pursuant to 11 CFR 104.4(c), ROF was not required to file a 24 hour report for this IE because it fell within 24 hours before the

A-G7 9 @B9CI G'H9LH'fl 97 : cfa ' - - L

PAGE 3 / 3

3/6/12 Tennessee primary. Although it was not required to file a 24 hour report for this IE, ROF chose to amend its 3/5/12 report on 3/27/12 to reflect IEs made within 24 hours of the 3/6/12 Tennessee Primary. Such over-reporting does not result in a "late" filing.

15. Actuate Strategies, LLC, 3/16/12, \$5,324.66, Voter Contact Phones, Richard J. Santorum, Received 3/18/12

This appears to be referring to an IE made on 3/16/12 supporting Mitt Romney for the 3/24/12 Louisiana Primary. ROF amended its 3/17/12 24 hour report to reflect this IE on 3/18/12 (Image #12951237922). In this case, ROF promptly and sua sponte reported this IE on an amended 24 hour report as soon as information that could require an amendment became available. Pursuant to the Commission's Statement of Policy Regarding Treasurers' Best Efforts from 2007 (Notice 2007 13, 72 FR 31438), ROF used its best efforts and took all reasonable steps to expeditiously correct this 24 hour IE report.

16. Actuate Strategies, LLC, 3/16/12, \$22,767.64, Voter Contact Phones, Richard J. Santorum, Received 3/18/12

This appears to be referring to an IE made on 3/16/12 opposing Rick Santorum for the 3/20/12 Illinois Primary. ROF amended its 3/17/12 24 hour report to reflect this IE on 3/18/12 (Image #12970747677). In this case, ROF promptly and sua sponte reported this IE on an amended 24 hour report as soon as information that could require an amendment became available. Pursuant to the Commission's Statement of Policy Regarding Treasurers' Best Efforts from 2007 (Notice 2007 13, 72 FR 31438), ROF used its best efforts and took all reasonable steps to expeditiously correct this 24 hour IE report.
